

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	WT Docket No. 03-187
Effects of Communications Towers on)	
Migratory Birds)	
)	

Comments on Behalf of

The following comments are submitted on behalf of New Vision Television and is in response to the Public Notice, DA 10-2178, dated November 12, 2010. I am Lynn Rowe, executive consultant/CTO for New Vision Television. I report to John Heinen, President and Chief Operating Officer of New Vision Television and manage all technical and engineering issues the New Vision Television stations; i.e., WKBN, WYFX, WJCL, WIAT, KIMT, KSNT, KTMJ, KSNW, KOIN and KHON. A graduate of Tufts University and New York University's Graduate School of Business, I have been a consultant and key executive in a wide variety of 'cutting edge,' global scale broadcasting, cable and communications projects;

- First conversion to satellite distribution by a US TV network
- First lease of international satellite capacity
- First sublease of international satellite capacity
- First on-air use of MPEG2 compression
- First use and development of DS3 fiber in the US
 - First virtualization of TV production; Nightline insertion into Network from Washington, D.C. via DS3 fiber
- Development of first US network SNG program w/ GTE
- Co-founder of (Vyvx) first US nationwide Video Fiber Network
- Management of World Cup USA 94 telecommunications facilities
 - First use of compression in a World Class sporting event
 - Large fiber and satellite hybrid network deployed for a World Class
- Implementation of first digital video networks in Central Europe
- First use of store & forward and automated edge server technologies in Network Distribution (MTV College Networks)

- First design & deployment of web based TV ad insertion platform (MTV College Networks)
- First development and implementation of a Patented, IP-Standards based TV production and multi-market, multi-tier channel distribution plant
- Development of IP-Standards based TV production and multi-market, multi-tier channel distribution technologies for use in World Class sporting events
- Application of Patented Supercomputing Technologies (Intelitrac, Inc.) and approaches to CG and broadcast operations
- Development of Patent Pending Biometric System Architecture
- Development of Patented system & method for the provision of QOS over wireless systems for the distribution of streaming media
- Development of Patent Pending system & method for distributed, collaborative object oriented media creation and non end user specific distribution of profiled content and applications.

In a review of the New Vision Television group station engineering staffs, the following is a summary of long term observations regarding New Vision transmitter tower operations and impact on migratory birds.

WIAT – Birmingham, AL – Scott Sarkisian; no observation of tower related migratory bird kills at this sight.

WKBN & WYFX – Youngstown, OH – Thomas Zocolo; no observation of tower related migratory bird kills at this sight.

WJCL – Savannah, GA – Ed Youmans; no observation of tower related migratory bird kills at this sight.

KIMT – Mason City, IA – Larry Eckblad; this station is currently operating off of a new Iowa Public Broadcasting tower that was constructed a couple of years ago. The observation at this site is that there was approximately two dozen birds that may have perished in the first year of this tower's operation. No bird deaths have been noted this winter. The timing of the bird deaths in the first year may not have been caused by the tower as the observation was that the birds that were affected were very late in the migration period, during extremely cold weather

and thus may have perished due to nature causes.

KSNT & KTMJ – Topeka, KS – Jeff Groves; no observation of tower related migratory bird kills at this sight.

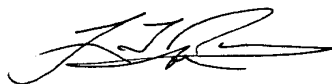
KSNW, plus four additional statewide transmitters – Wichita, KS – Warren Kunkle; no observation of tower related migratory bird kills at this sight.

KOIN, plus statewide translators – Portland, OR – David Bird; no observation of tower related migratory bird kills at this sight.

KHON, plus Maui, Hawaii & Kauai transmitters – Oahu, HI – Bob Vaillancourt; no observation of tower related migratory bird kills at any of these sights. This is of particular note due to the wild life management issues related to the KAIH operation of Maui which requires that periodic, reoccurring sight surveys are required to determine if this new tower operation has any impact on native birds in the area. No reported bird deaths have been noted and/or reported since the beginning of operations of the KAIH Maui tower/transmitters.

In conclusion, there is nothing that New Vision engineering has noted in the operation of any of its towers that indicates that there has been any negative impact of these towers on migratory bird activity up and beyond what may be considered normal/natural hazards to bird life in and around these towers; i.e., normal weather conditions, predators, etc.

The undersigned has been in the broadcast field for over 32 years and in continuous employment for over 32 years.

A handwritten signature in black ink, appearing to read 'L. Rowe', with a stylized flourish extending to the right.

Lynn T. Rowe

Executive Consultant/CTO, New Vision Television